

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

BCI ACRYLIC, INC., )  
v. Plaintiff, ) Case No. 2:23-cv-00908-JPS  
MILESTONE BATH )  
PRODUCTS INC., *et al.*, )  
Defendants. )

**DEFENDANT TIGHTSEAL LLC'S NOTICE OF WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL**

PLEASE TAKE NOTICE that pursuant to Civil L. R. 7.1(e)(2), Defendant TightSeal LLC (“TightSeal” or “Defendant”) hereby withdraws the appearance of James Earle Lowe, Jr. of James Lowe Law, and substitutes Ketajh M. Brown of K&L Gates LLP as counsel of record in the above-captioned case.

The undersigned, as successor counsel for TightSeal, furnishes the following information in compliance with Civil L. R. 7.1(e)(2)(A)-(D):

A. I, Ketajh M. Brown, affirm that I have been retained by Defendant TightSeal LLC as counsel in connection with the above-referenced matter and hereby enter my appearance

as counsel for Defendant TightSeal LLC;

B. The names and addresses of the withdrawing counsel and successor counsel are as follows:

Withdrawing Counsel:

James Earl Lowe, Jr.  
**JAMES LOWE LAW**  
5465 S Nicole Ct.  
New Berlin, WI 53151  
jim@jameslowe.law

Successor Counsel:

Ketajh M. Brown (Bar No. 1106210)  
**K&L GATES LLP**  
70 West Madison Street, Suite 3100  
Chicago, IL 60602  
ketajh.brown@klgates.com

C. This withdrawal and substitution has been discussed with TightSeal and Defendant TightSeal LLC consents thereto; and

D. This withdrawal and substitution will not cause any delay to trial or other progress of the case as TightSeal's interests will continue to be represented by counsel. Accordingly, please remove attorney James Lowe from this case and from the Court's electronic service list for the above-captioned matter and substitute Ketajh Brown as counsel of record for Defendant TightSeal LLC.

Dated: September 1, 2023

Respectfully submitted,

By: /s/ Ketajh Brown  
Ketajh Brown  
**K&L GATES LLP**  
70 W. Madison Street  
Suite 3100  
Chicago, IL 60602  
Tel.: (312) 807-4439  
ketajh.brown@klgates.com

***Successor Counsel for Defendant  
TightSeal LLC***

By: /s/ James Lowe (with consent)  
James Earle Lowe, Jr.  
WI Bar# 1016834  
**JAMES LOWE LAW**  
5465 S Nicole Ct.  
New Berlin, WI 53151  
Tel.: (414) 736-8099  
jim@jameslowe.law

***Withdrawing Counsel for Defendant  
TightSeal LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2023, I caused a true and correct copy of the foregoing document to be served upon counsel of record as of this date by filing same through the Court's CM/ECF system.

/s/ Ketajh M. Brown